

EXHIBIT A

From: Sarah Salomon
Sent: Friday, May 27, 2022 5:56 PM
To: Amy Senia; Ellen Leonida; Matt Rienstra; Pratik Ghosh; Dwain K. Rogers
Cc: Ryan Botkin; Katherine Chiarello; Kerri Sawyer
Subject: RE: Leila Green Little, et al v. Llano County, et al; Civil Action No. 5:22-cv-400, U.S. District Court, Western District of Texas (Austin Div.)

Dwain,

Nice to meet you via email – I just left you a voicemail. I’m following up with respect to the issues you discussed with my colleagues Amy and Ellen last week. It’s our understanding that you were planning to retain counsel by today. If you have done so, please let us know who we should contact regarding this matter going forward.

We also wanted to discuss our pending discovery related to the PI, which Judge Pitman indicated that he expected the parties to work collaboratively to complete. We have noticed the depositions of Jerry Don Moss, Amber Milum, and Bonnie Wallace, and hope to work out scheduling for those depositions. Could you (or retained counsel) please provide us some available dates? We will need to obtain responses to the written discovery attached to our motion prior to the depositions.

Thanks,
Sarah

From: Amy Senia <senia@braunhagey.com>
Sent: Wednesday, May 18, 2022 12:42 PM
To: Ellen Leonida <Leonida@braunhagey.com>; Matt Rienstra <matt.renstra@co.llano.tx.us>; Pratik Ghosh <Ghosh@braunhagey.com>; Sarah Salomon <Salomon@braunhagey.com>
Cc: Ryan Botkin <ryan@wittliffcutter.com>; Katherine Chiarello <katherine@wittliffcutter.com>; Dwain K. Rogers <drogers@co.llano.tx.us>; Kerri Sawyer <cao5@co.llano.tx.us>
Subject: RE: Leila Green Little, et al v. Llano County, et al; Civil Action No. 5:22-cv-400, U.S. District Court, Western District of Texas (Austin Div.)

Dwain,

It was nice to meet you earlier and thank you for taking the time to meet and confer with us regarding Plaintiffs’ pending Preliminary Injunction Motion and Motion for Expedited Discovery. As you requested, I’m attaching the Court’s order with the dial-in information for tomorrow’s hearing at 9 a.m.

As we discussed, you expect to have retained counsel by May 27, 2022, and, if you retain counsel prior to May 27, you will instruct your counsel to contact us. You also agreed that Defendants will file a response to Plaintiffs’ Motion for Expedited Discovery by June 1, 2022.

Further, you agreed to work with Defendants to gather all documents and information responsive to Plaintiffs’ discovery requests between now and June 1, 2022. If Defendants agree to production of the limited discovery Plaintiffs seek in their Motion for Expedited Discovery, you will produce those documents by June 2, 2022. If the Court orders production at a later date, those discovery responses will be ready for immediate production.

Take care,

Amy Senia (she/her)

B R A U N H A G E Y & B O R D E N L L P

Direct: (415) 685-4241